

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

SHAUNA ZIEMER, as Executrix  
of the Estate of Darrin E. Ziemer,

Plaintiff

v.

NORFOLK SOUTHERN  
RAILWAY COMPANY, CLINTON  
TOWNSHIP, GRIFFITH  
COMPANY AND ESTATE OF  
HOWARD E. MARTIN, JR.

Defendants

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: CIVIL ACTION  
: DOCKET NO. 4:16-CV-01001  
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**ANSWER OF THE ESTATE OF HOWARD E. MARTIN, JR.,**  
**TO THE CROSSCLAIM OF NORFOLK SOUTHERN**  
**RAILWAY COMPANY**

79. The answer, affirmative defenses and crossclaim of the Estate of Howard E. Martin, Jr., is incorporated herein by reference.
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81. This is a conclusion of law to which no response is required. It is, however, denied that the Estate of Howard E. Martin Jr., is liable to plaintiff or to Clinton Township, in any way.

**MITCHELL GALLAGHER, P.C.**

BY: /s/ Gary L. Weber  
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